

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' TRIAL EXHIBITS**

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. ("Defendants"), by counsel, hereby submit the following objections to Plaintiffs' Trial Exhibits.

**EXHIBITS PLAINTIFFS WILL INTRODUCE**

**I. Declarations and Reports**

<b>No.</b>	<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>	<b>Objection</b>
01	Declaration of Brady M. Bustany (11/13/2016)	N/A	N/A	Hearsay, Foundation, Cumulative
02	Declaration/Expert Report of Ivan Yacub, Esq. (10/28/2016)	N/A	N/A	Hearsay, Foundation, Relevance, Cumulative
03	Declaration/Expert Reports of Professor William A.V. Clark (12/22/2016) attaching opening report and rebuttal report	N/A	N/A	Hearsay, Foundation, Cumulative

**II. Plaintiffs' Lease Materials**

<b>No.</b>	<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>	<b>Objection</b>
08	Felix Bolaños Application for Residency (Dwoskin & Associates)	WAPLES00000115	WAPLES00000115	Hearsay, Foundation, Relevance

09	Jose Reyes Application for Residency (Dwoskin & Associates) (5/18/2013)	GIRON00000695	GIRON00000695	Hearsay, Foundation, Relevance
10	Jose Reyes Application for Residency (JBG Companies) (2016)	GIRON00000994	GIRON00000995	Hearsay, Foundation, Relevance
11	Rosy Giron de Reyes Application for Residency (JBG Companies) (2016)	GIRON00001194	GIRON00001195	Hearsay, Foundation, Relevance
12	Esteban Moya Application for Residency (Dwoskin & Associates) (12/07/2010)	WAPLES00000974	WAPLES00000975	Hearsay, Foundation, Relevance
13	Herbert Saravia Cruz Application for Residency (Dwoskin & Associates) (1/07/2012)	WAPLES00000343	WAPLES00000346	Hearsay, Foundation, Relevance
14	Mario Medina Application for Residency (Dwoskin & Associates) (1/31/2012)	WAPLES00000347	WAPLES00000347	Hearsay, Foundation, Relevance
15	Application for Residency as Occupant (3/10/2009)	WAPLES00000761	WAPLES00000762	Hearsay, Foundation, Relevance
16	Application for Residency as Leaseholder (5/5/2009)	WAPLES00000763	WAPLES00000766	Hearsay, Foundation, Relevance
17	Application for Residency as Occupant (5/5/2009)	WAPLES00000767	WAPLES00000769	Hearsay, Foundation, Relevance
18	Application for Residency as Leaseholder (8/25/2010)	WAPLES00000770	WAPLES00000773	Hearsay, Foundation, Relevance
19	Application for Residency as Occupant (8/25/2010)	WAPLES00000774	WAPLES00000776	Hearsay, Foundation, Relevance
20	Application for Residency as Leaseholder (8/10/2011)	WAPLES00000777	WAPLES00000779	Hearsay, Foundation, Relevance
21	Application for Residency (8/12/2013)	WAPLES00000780	WAPLES00000780	Hearsay, Foundation, Relevance
22	Application for Residency (12/4/2015)	WAPLES00000781	WAPLES00000781	Hearsay, Foundation, Relevance
23	Application for Residency (1/28/2016)	WAPLES00000782	WAPLES00000782	Hearsay, Foundation, Relevance
24	Application for Residency (7/27/2016)	WAPLES00000783	WAPLES00000783	Hearsay, Foundation, Relevance
25	2015-2016 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000051	WAPLES00000053	Hearsay, Foundation, Relevance
26	2015-2016 Mobile Home Lease Agreement between Esteban Moya and Defendants	GIRON00000642	GIRON00000652	Hearsay, Foundation, Relevance

27	2015-2016 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	GIRON00000844	GIRON00000846	Hearsay, Foundation, Relevance
28	2011-2012 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000920	WAPLES00000921	Hearsay, Foundation, Relevance
29	2014-2015 Mobile Home Lease Agreement between Esteban Moya and Defendants	GIRON00000653	GIRON00000655	Hearsay, Foundation, Relevance
30	2012-2013 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000254	WAPLES00000255	Hearsay, Foundation, Relevance
31	2014-2015 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000247	WAPLES00000249	Hearsay, Foundation, Relevance
32	2014-2015 Mobile Home Lease Agreement between Jose Reyes and Defendants	WAPLES00000433	WAPLES00000443	Hearsay, Foundation, Relevance
33	2012-2013 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000082	WAPLES00000083	Hearsay, Foundation, Relevance
34	2013-2014 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000080	WAPLES00000081	Hearsay, Foundation, Relevance
35	2014-2015 Mobile Home Lease Agreement between Felix Bolaños and Defendants.	WAPLES00000077	WAPLES00000079	Hearsay, Foundation, Relevance
36	Addendum to 2014-2015 Lease Agreement between Felix Bolaños and Defendants	WAPLES00000086	WAPLES00000091	Hearsay, Foundation, Relevance
37	Manufactured Home Site Rental Agreement between Felix Bolaños and Ruth Rivas and Meadows of Chantilly Manufactured Home Community (9/30/2016)	GIRON00000885	GIRON00000893	Hearsay, Foundation, Relevance
38	2012-2013 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000918	WAPLES00000919	Hearsay, Foundation, Relevance
39	2014-2015 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000897	WAPLES00000899	Hearsay, Foundation, Relevance

40	2013-2014 Mobile Home Lease Agreement between Jose Reyes and Defendants	WAPLES00000484	WAPLES00000496	Hearsay, Foundation, Relevance
41	2013-2014 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000916	WAPLES00000917	Hearsay, Foundation, Relevance
42	2015-2016 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000840	WAPLES00000853	Hearsay, Foundation, Relevance
43	2013-2014 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000250	WAPLES00000251	Hearsay, Foundation, Relevance
44	Utility Addendum to 2014-2015 Mobile Home Lease Agreement between Herbert Saravia Cruz/Mario Medina and Defendants	WAPLES00000256	WAPLES00000257	Hearsay, Foundation, Relevance
45	Utility Addendum to 2014-2015 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000084	WAPLES00000085	Hearsay, Foundation, Relevance
46	Lease Addendum to 2014-2015 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000086	WAPLES00000091	Hearsay, Foundation, Relevance
47	Lease Addendum signed by Felix Bolaños and Josephine Giambanco (undated)	WAPLES00000056	WAPLES00000061	Hearsay, Foundation, Relevance
48	Utility Addendum to 2015-2016 Mobile Home Lease Agreement between Felix Bolaños and Defendants	WAPLES00000054	WAPLES00000055	Hearsay, Foundation, Relevance
49	Utility Addendum to 2014-2015 Mobile Home Lease Agreement between Esteban Moya and Defendants	WAPLES00000900	WAPLES00000901	Hearsay, Foundation, Relevance
50	Lease Addendum signed by Herbert Saravia Cruz, Mario Medina, and Yvette Jimenez (2015)	WAPLES00000216	WAPLES00000221	Hearsay, Foundation, Relevance
51	Lease Addendum signed by Jose Reyes (2014)	WAPLES00000438	WAPLES00000442	Hearsay, Foundation, Relevance
52	Lease Addendum signed by Esteban Moya (2014)	WAPLES00000845	WAPLES00000850	Hearsay, Foundation, Relevance

53	Lease Addendum (8/11/2016)	WAPLES00000790	WAPLES00000795	Hearsay, Foundation, Relevance
54	Lease Addendum (1/2014)	WAPLES00000784	WAPLES00000789	Hearsay, Foundation, Relevance
55	Rules and Regulations for Chantilly Manufactured Home Community signed by Ruth Rivas and Felix Bolaños (2016)	GIRON00000874	GIRON00000884	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
56	Mobile Home Park Rules and Regulations, signed by Felix Bolaños (2012)	WAPLES00000092	WAPLES00000101	None
57	Mobile Home Park Rules and Regulations, signed by Esteban Moya (2011)	WAPLES00000922	WAPLES00000927	None
58	Mobile Home Park Rules and Regulations, signed by Esteban Moya (2014)	WAPLES00000902	WAPLES00000911	None
59	Mobile Home Park Rules and Regulations, signed by Herbert Saravia Cruz and Mario Medina (2012)	WAPLES00000268	WAPLES00000273	None
60	Mobile Home Park Rules and Regulations, signed by Herbert Saravia Cruz and Mario Medina (2014)	WAPLES00000258	WAPLES00000267	None
61	Criminal Background Check for Rosy Giron de Reyes (12/04/2015)	GIRON00000696	GIRON00000697	Hearsay, Foundation, Relevance
62	Resident Screening Report for Herbert Saravia Cruz (2/03/2012)	WAPLES00000288	WAPLES00000295	Hearsay, Foundation, Relevance
63	Resident Screening Report for Jose Reyes (5/20/2013)	WAPLES00000500	WAPLES00000507	Hearsay, Foundation, Relevance
64	Resident Screening Report for Esteban Moya (12/09/2010)	WAPLES00000930	WAPLES00000937	Hearsay, Foundation, Relevance
65	Core Logic Reports for Male Plaintiffs	RPS000009	RPS000016	Hearsay, Foundation, Relevance
66	Renewal Letter from Defendants to Jose Reyes/Letter to Jose Reyes Adding Wife to Account (2015)	GIRON00000730	GIRON00000733	Hearsay, Foundation
67	Lease Renewal Letter from Defendants to Jose Reyes and All Occupants (2015)	WAPLES00000431	WAPLES00000431	Hearsay, Foundation
68	Renewal Notices to Esteban Moya (2011-2013)	WAPLES00000854	WAPLES00000896	Hearsay, Foundation

69	Mobile Home Inspection for Herbert Saravia Cruz (2014)	WAPLES00000274	WAPLES00000275	Hearsay, Foundation, Relevance
70	Mobile Home Inspection for Felix Bolaños (2016)	WAPLES00001859	WAPLES00001860	Hearsay, Foundation, Relevance
71	Handwritten Note from Esteban Moya, including renter's insurance and airline ticket (1/11/2016)	WAPLES00000979	WAPLES00000988	Hearsay, Foundation, Relevance
72	Mobile Home Inspection for Esteban Moya (2016)	WAPLES00001064	WAPLES00001065	Hearsay, Foundation, Relevance

### III. Documents Defining Defendants' Policy

No.	Description	Begin Bates	End Bates	Objection
73	Future Resident Information Guide (5/18/2006)	WAPLES00000733	WAPLES00000734	Hearsay, Foundation, Relevance, Cumulative
74	Future Resident Information Guide (10/18/2006)	WAPLES00000735	WAPLES00000736	Hearsay, Foundation, Relevance, Cumulative
75	Future Resident Information Guide (1/17/2011)	WAPLES00000737	WAPLES00000737	Hearsay, Foundation, Relevance, Cumulative
76	Future Resident Information Guide (3/4/2011)	WAPLES00000738	WAPLES00000738	Hearsay, Foundation, Relevance, Cumulative
77	Future Resident Information Guide (6/27/2011)	WAPLES00000739	WAPLES00000740	Hearsay, Foundation, Relevance, Cumulative
78	Future Resident Information Guide (3/23/2012)	WAPLES00000741	WAPLES00000742	Hearsay, Foundation, Relevance, Cumulative
79	Future Resident Information Guide (4/25/2012)	WAPLES00000743	WAPLES00000744	Hearsay, Foundation, Relevance, Cumulative

80	Future Resident Information Guide (9/11/2013)	WAPLES00000745	WAPLES00000746	Hearsay, Foundation, Relevance, Cumulative
81	Future Resident Information Guide (3/20/2014)	WAPLES00000747	WAPLES00000748	Hearsay, Foundation, Relevance, Cumulative
82	Future Resident Information Guide (5/14/2015)	WAPLES00000749	WAPLES00000750	Hearsay, Foundation, Relevance
83	Future Resident Information Guide (9/8/2015)	WAPLES00000751	WAPLES00000752	Hearsay, Foundation, Relevance
84	Future Resident Information Guide (3/31/2016)	WAPLES00000753	WAPLES00000754	Hearsay, Foundation, Relevance
85	Future Resident Information Guide (4/22/2016)	WAPLES00000755	WAPLES00000756	Hearsay, Foundation, Relevance
86	Future Resident Information Guide (5/16/2016)	WAPLES00000757	WAPLES00000758	Hearsay, Foundation, Relevance
87	Future Resident Information Guide (8/10/2016)	WAPLES00000759	WAPLES00000760	Hearsay, Foundation, Relevance

#### IV. Internal Defendant Guides, Memoranda, and Other Business Documents

No.	Description	Begin Bates	End Bates	Objection
88	Resident Selection and Occupancy Standards (2/19/2013)	WAPLES00002320	WAPLES00002351	Relevance
89	Resident Selection and Occupancy Standards (9/13/2013)	WAPLES00002680	WAPLES00002712	Relevance
90	Resident Selection and Occupancy Standards (10/25/2013)	WAPLES00002801	WAPLES00002832	Relevance
91	Resident Selection and Occupancy Standards (11/1/2013)	WAPLES00002764	WAPLES00002795	Relevance
92	Resident Selection and Occupancy Standards (4/20/2015)	WAPLES00002602	WAPLES00002633	Relevance
93	Resident Selection and Occupancy Standards (5/8/2015)	WAPLES00002502	WAPLES00002533	Relevance
94	CoreLogic Contract with A.J. Dwoskin (6/20/2001)	RPS000001	RPS000008	Hearsay, Foundation, Relevance

95	A.J. Dwoskin Consumer Reports & CoreLogic SafeRent Training Manual (1/24/2011)	WAPLES00000572	WAPLES00000732	Relevance
96	Yardi RentGrow Screening Services Activation Agreement (4/26/2013)	WAPLES00000814	WAPLES00000826	Hearsay, Foundation, Relevance
97	Yardi Resident Screening (2013)	WAPLES00000796	WAPLES00000813	Hearsay, Foundation, Relevance
98	Resident Ledger for Jose Reyes (11/17/2016)	WAPLES00003117	WAPLES00003123	Hearsay, Foundation, Relevance
99	Resident Ledger for Felix Bolaños (11/17/2016)	WAPLES00003098	WAPLES00003106	Hearsay, Foundation, Relevance
100	Resident Ledger for Esteban Moya (11/17/2016)	WAPLES00003107	WAPLES00003116	Hearsay, Foundation, Relevance
101	Resident Ledger for Herbert Saravia Cruz (11/17/2016)	WAPLES00003124	WAPLES00003134	Hearsay, Foundation, Relevance
104	List of Noncompliant Waples Tenants and Outstanding Documentation; Violation Letters (2015-2016)	WAPLES00001272	WAPLES00001330	Hearsay, Foundation, Relevance
105	Move Out Report: Waples Project LP	WAPLES00002981	WAPLES00002981	Hearsay, Foundation, Relevance

#### V. Defendants' Internal Correspondence

No.	Description	Begin Bates	End Bates	Objection
123	Email between Carolina Easton, Josephine Giambanco, Mark Jones, and Others, with Attachments (5/17/2016)	WAPLES00002441	WAPLES00002457	Hearsay, Foundation, More Prejudicial Than Probative

#### VI. Eviction Correspondence with and Related to Plaintiffs

No.	Description	Begin Bates	End Bates	Objection
151	Violation Letter from Defendants to Esteban Moya (1/18/2016)	WAPLES00001141	WAPLES00001143	Hearsay, Foundation
152	Violation Letter from Defendants to Herbert Saravia Cruz and Mobile Home Inspection Form (1/18/2016)	WAPLES00001854	WAPLES00001855	Hearsay, Foundation

153	Letter Informing Residents of Month to Month Surcharge Increase to \$300 (3/11/2016)	GIRON00000033	GIRON00000033	Hearsay, Foundation, Relevance
154	Eviction Letter to Jose Reyes (2/4/2016)	GIRON00000698	GIRON00000698	Hearsay, Foundation
155	Letter from Herbert Saravia Cruz to Defendants Regarding Sale of Mobile Home (1/27/2016)	WAPLES00000198	WAPLES00000198	Hearsay, Foundation, Relevance
156	Violation Letter from Defendants to Felix Bolaños (3/2/2016)	WAPLES00001332	WAPLES00001332	Hearsay, Foundation
157	Violation Letter from Defendants to Herbert Saravia Cruz (1/18/2016)	WAPLES00000199	WAPLES00000199	Hearsay, Foundation
158	21/30 Notice to Jose Reyes and All Occupants (1/27/2016)	WAPLES00001785	WAPLES00001789	Hearsay, Foundation
159	Letter from Voice to Albert Dwoskin (8/12/2016)	WAPLES00002992	WAPLES00003002	Hearsay, Foundation, Relevance
160	Letter from VA Senators to Mike Dean (7/22/2016)	WAPLES00003004	WAPLES00003004	Hearsay, Foundation, Relevance
161	Audio File (3/2016)	GIRON00000045	GIRON00000045	Hearsay, Foundation, Relevance
162	Audio File (3/2016)	GIRON00000048	GIRON00000048	Hearsay, Foundation, Relevance
163	Email between Jeff Franzen and Simon Sandoval-Moshenberg regarding Dwoskin Evictions (11/20/2015)	GIRON00000133	GIRON00000134	Hearsay, Foundation, Relevance
164	Notice to Jose Reyes of Acceptance of Rent with Reservation to Proceed with Eviction (2/03/2016)	GIRON00000693	GIRON00000693	Hearsay, Foundation, Relevance
165	60 Day Termination Notice from Defendants to Esteban Moya and All Occupants (11/30/2016)	N/A	N/A	Hearsay, Foundation, Relevance
166	Notice of Acceptance of Rent with Reservation to Proceed with Eviction from Defendants to Esteban Moya and All Occupants (12/5/2016)	N/A	N/A	Hearsay, Foundation, Relevance

## EXHIBITS PLAINTIFFS MAY INTRODUCE

### I. Written Discovery

No.	Description	Begin Bates	End Bates	Objection
05	Portions of Defendants' Answer to Interrogatories Not Specifically Objected to by Plaintiffs	N/A	N/A	Relevance
06	Portions of Defendants' Responses to Jose Dagoberto Reyes's First Set of Interrogatories Not Specifically Objected to by Plaintiffs	N/A	N/A	Relevance
07	Defendants' Supplemental Answer to Interrogatory 6	N/A	N/A	Relevance

### II. Declarations and Reports

No.	Description	Begin Bates	End Bates	Objection
04	Dr. Weinberg's Reproduction of the Mathematical Calculations from his Expert Report (1/4/2017)	N/A	N/A	Hearsay, Foundation

### III. Internal Defendant Guides, Memoranda, and Other Business Documents

No.	Description	Begin Bates	End Bates	Objection
102	Residential Marketing Plan (2014)	WAPLES00001676	WAPLES00001693	Hearsay, Foundation, Relevance
103	"Daily Happenings at Bull Run & Waples" for 8/28/2015	WAPLES00001498	WAPLES00001499	Hearsay, Foundation, Relevance
106	"Daily Happenings at Bull Run & Waples" for 2/11/2016	WAPLES00001435	WAPLES00001437	Hearsay, Foundation, Relevance
107	List of Individuals Who Received Background Check	WAPLES00001338	WAPLES00001350	Hearsay, Foundation, Relevance
108	Organizational Chart for Waples Mobile Home Park LP	WAPLES00001331	WAPLES00001331	Hearsay, Foundation, Relevance
109	Grace Hill Certificates of Achievement for Valerie Dixon, Carolina Easton, Mayra Lopez, Jessica Armstead, Mark Jones, and Josephine Giambanco	WAPLES00001257	WAPLES00001263	None
110	List of Waples Residents (redacted by Defendants)	WAPLES00001335	WAPLES00001337	Hearsay, Foundation

**IV. Defendants' Internal Correspondence**

<b>No.</b>	<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>	<b>Objection</b>
111	Email from Peter Williams to Distribution List with Attachments (11/9/2015)	WAPLES00001724	WAPLES00001733	Hearsay, Foundation, Relevance
112	Email from Theresa Osborne to Peter Williams (10/28/2013)	WAPLES00002800	WAPLES00002832	Hearsay, Foundation, Relevance
113	Email from Peter Williams to Albert Dwoskin (6/19/2015)	WAPLES00001503	WAPLES00001507	Hearsay, Foundation, Relevance
114	Email between Peter Williams and Theresa Osborne with Attachment (5/14/2014)	WAPLES00002355	WAPLES00002357	Hearsay, Foundation, Relevance
115	Email from Carolina Easton to Peter Williams, Mark Jones, and Others with Attachment (5/15/2015)	WAPLES00002501	WAPLES00002533	Hearsay, Foundation, Relevance
116	Email between Josephine Giambanco, Lindsay Gilbert, Theresa Osborne, and Others with Attachment (3/20/2014)	WAPLES00001367	WAPLES00001371	Hearsay, Foundation, Relevance
117	Email from Theresa Osborne to Peter Williams with Attachment (1/7/2013)	WAPLES00002833	WAPLES00002865	Hearsay, Foundation, Relevance
118	Email from Theresa Osborne to "Residential Managers" with Attachment (12/20/2013)	WAPLES00002239	WAPLES00002271	Hearsay, Foundation, Relevance
119	Email from Peter Williams to Julia Edwards (Core Logic) (8/29/2011)	WAPLES00001723	WAPLES00001723	Hearsay, Foundation, Relevance
120	Email from Peter Williams to Albert Dwoskin with Attachment (11/10/2015)	WAPLES00001488	WAPLES00001496	Hearsay, Foundation, Relevance
121	Email between Carolina Easton, Jessica Armstead, and Josephine Giambanco (1/14/2016)	WAPLES00002433	WAPLES00002435	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
122	Email between Carolina Easton, Josephine Giambanco, and Carolina Easton with Attachment (5/19/2014)	WAPLES00002278	WAPLES00002280	Hearsay, Foundation
124	Email between Carolina and Josephine Giambanco with Attachments (8/17/2016)	WAPLES00002272	WAPLES00002277	Hearsay, Foundation

125	Email between Josephine Giambanco, Carolina Easton, and Jessica Armstead with Attachments (2/3/2016)	WAPLES00001783	WAPLES00001789	Hearsay, Foundation, Relevance
126	Email between Carolina Easton, Josephine Giambanco, Jessica Armstead, and Mark Jones (8/29/2016)	WAPLES00002925	WAPLES00002930	Hearsay, Foundation, Relevance
127	Email from Sabiha Noorzai to "Daily Reports" (7/29/2011)	WAPLES00001470	WAPLES00001470	Hearsay, Foundation, Relevance
128	Email from Cliff Liautaud to Josephine Giambanco and Mayra Lopez with Attachment (4/22/2016)	WAPLES00001532	WAPLES00001535	Hearsay, Foundation, Relevance, Cumulative
129	Email from Cliff Liautaud to Josephine Giambanco and Mayra Lopez with Attachment (5/16/2016)	WAPLES00001521	WAPLES00001524	Hearsay, Foundation, Relevance, Cumulative
130	Email between Carolina Easton and Lindsay Gilbert (9/3/2014)	WAPLES00001619	WAPLES00001620	Hearsay, Foundation, Relevance
131	Email between Carolina Easton and Lindsay Gilbert (9/3/2014)	WAPLES00001616	WAPLES00001618	Hearsay, Foundation, Relevance
132	Email between Jessica Armstead, Carolina Easton, "Residential Managers" and "Residential Assistant Managers" (8/22/2016)	WAPLES00001425	WAPLES00001427	Hearsay, Foundation, Relevance
133	Email between Carolina Easton, Mark Jones, and Peter Williams (4/28/2015)	WAPLES00002978	WAPLES00002979	Hearsay, Foundation, Relevance
134	Email from Valerie Dixon to Josephine Giambanco with attachment (2/11/2016)	WAPLES00001605	WAPLES00001607	Hearsay, Foundation, Relevance
135	Email between Josephine Giambanco and Carolina Easton (3/18/2016)	WAPLES00002964	WAPLES00002965	Hearsay, Foundation, Relevance
136	Email from Carolina Easton to Peter Williams with Attachment (3/17/2014)	WAPLES00002634	WAPLES00002645	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
137	Email from Josephine Giambanco to Carolina Easton with Attachment (4/28/2014)	WAPLES00002281	WAPLES00002283	Hearsay, Foundation, Relevance
138	Email between Carolina Easton, Josephine Giambanco, Mark Jones, and Others (10/28/2015)	WAPLES00001571	WAPLES00001574	Hearsay, Foundation, Relevance

139	Email between Carolina Easton, Josephine Giambanco, and Mark Jones (8/25/2016)	WAPLES00002972	WAPLES00002977	Hearsay, Foundation, Relevance
140	Email between Carolina Easton, Mark Jones, Valerie Dixon, and Jessica Armstead with Attachment (5/3/2016)	WAPLES00002796	WAPLES00002798	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
141	Email from Mark Jones to Carolina Easton and Jessica Armstead with Attachment (5/3/2016)	WAPLES00002426	WAPLES00002427	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
142	Email from Carolina Easton to Mark Jones and Jessica Armstead with Attachment (5/17/2016)	WAPLES00002451	WAPLES00002459	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
143	Email between Mark Jones and Kevin Ortega of Yardi (5/27/2016)	WAPLES00002417	WAPLES00002420	Hearsay, Foundation, Relevance
144	Email from Mayra Lopez to Josephine Giambanco (3/2/2016)	WAPLES00001384	WAPLES00001384	Hearsay, Foundation, Relevance
145	Email between Josephine Giambanco, Yvette Jimenez, and Carolina Easton with Attachment (5/19/2014)	WAPLES00002278	WAPLES00002280	Hearsay, Foundation, Relevance
146	Email from Josephine Giambanco to Carolina Easton with Attachment (3/21/2014)	WAPLES00002284	WAPLES00002285	Hearsay, Foundation, Relevance
147	Email between Carolina Easton and Josephine Giambanco (5/17/2013)	WAPLES00001372	WAPLES00001373	Hearsay, Foundation, Relevance
148	Email from Carolina Easton with Attachment (9/29/2015)	WAPLES00002208	WAPLES00002209	Hearsay, Foundation, Relevance
149	Email from Josephine Giambanco to Valerie Dixon (5/11/2016)	WAPLES00002447	WAPLES00002448	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
150	Email from Theresa Osborne to “Residential Managers and “Residential Assistant Managers” (7/15/2013)	WAPLES00001459	WAPLES00001459	Hearsay, Foundation, Relevance

**V. Publicly Available Records and Documents**

<b>No.</b>	<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>	<b>Objection</b>
167	The Washington Post: “Without Social Security numbers, illegal immigrants face eviction” (2/10/2016)	WAPLES00001356	WAPLES00001358	Hearsay, Foundation, Relevance, More Prejudicial Than Probative
168	“Overview of Race and Hispanic Origin: 2010” (2010 Census Briefs) (3/2011)	GIRON00000589	GIRON00000612	Hearsay, Foundation, Relevance
169	“Profile of the Unauthorized Population: Fairfax County, VA”	GIRON00000613	GIRON00000622	Hearsay, Foundation, Relevance
170	“2010-2014 American Community Survey 5 Year Estimates”: Units in Structure	GIRON00000523	GIRON00000524	Hearsay, Foundation, Relevance
171	“2010-2014 American Community Survey 5 Year Estimates”: Selected Characteristics of the Native and Foreign-Born Populations	GIRON00000525	GIRON00000533	Hearsay, Foundation, Relevance
172	“Unauthorized Immigrant Totals Rise in 7 States, Fall in 14: Decline in those from Mexico fuels most state decreases” (11/18/2014)	GIRON00000218	GIRON00000271	Hearsay, Foundation, Relevance
173	“Fairfax County Department of Housing and Community Development Semi Annual At Risk Housing Report” (6/25/2010)	GIRON00000574	GIRON00000582	Hearsay, Foundation, Relevance
174	“2010-2014 American Community Survey 5 Year Estimates”: Housing Units	GIRON00000522	GIRON00000522	Hearsay, Foundation, Relevance
175	“Estimates of the Unauthorized Population for States” Data for Virginia	N/A	N/A	Hearsay, Foundation, Relevance
176	“Quick Facts: Virginia”	N/A	N/A	Hearsay, Foundation, Relevance
177	“2010-2014 American Community Survey 5- Year Estimates”: Housing Units for Fairfax County	N/A	N/A	Hearsay, Foundation, Relevance

178	“2010-2014 American Community Survey 5- Year Estimates”: Units in Structure for Virginia	N/A	N/A	Hearsay, Foundation, Relevance
179	“2010-2014 American Community Survey 5- Year Estimates”: Units in Structure for Fairfax County	N/A	N/A	Hearsay, Foundation, Relevance
180	“2010-2014 American Community Survey 5- Year Estimates”: Selected Characteristics of the Native and Foreign-Born Populations for Virginia	N/A	N/A	Hearsay, Foundation, Relevance
181	The Washington Post: “Undocumented Latinos and their families sue after evictions” (5/23/2016)	N/A	N/A	Hearsay, Foundation, Relevance, More Prejudicial Than Probative

Dated: December 23, 2020

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, WAPLES PROJECT LIMITED  
PARTNERSHIP AND  
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Grayson P. Hanes (VSB #06614)  
Michael S. Dingman (VSB #30031)  
Justin deBettencourt (VSB #83806)  
7900 Tysons One Place  
Suite 500  
McLean, Virginia 22102  
(703) 641-4200 (Telephone)  
(703) 641-4340 (Facsimile)  
[gghanes@reedsmith.com](mailto:gghanes@reedsmith.com)  
[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)  
[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of December, 2020, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

\_\_\_\_\_  
Grayson P. Hanes (VSB No. #06614)

Michael S. Dingman (VSB #30031)

Justin deBettencourt (VSB #83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

[ghanes@reedsmith.com](mailto:ghanes@reedsmith.com)

[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)

[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)